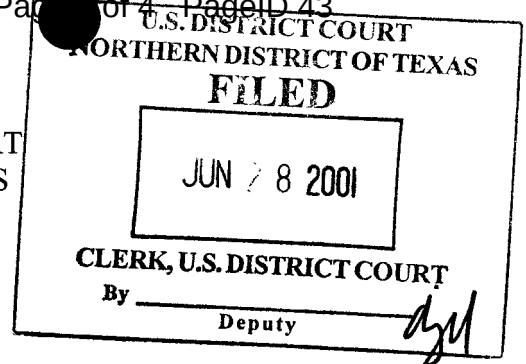


ORIGINAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



RANDOLPH-RAND CORPORATION  
OF NEW YORK

Plaintiffs,

v.

J&H TRADING CO.  
and HAK SON AHN

Defendants.

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CIVIL ACTION NO. 3-01CV00894-D

PLAINTIFF RANDOLPH-RAND CORPORATION'S ANSWER TO  
DEFENDANTS J&H TRADING COMPANY AND HAK SON AHN'S COUNTERCLAIM

Plaintiff, Randolph-Rand Corporation of New York ("Randolph-Rand"), files this original answer to defendants J&H Trading Company and Hak Son Ahn's counterclaim.

A. Admissions & Denials

1. Plaintiff admits the allegations in paragraph 1.
2. Plaintiff admits the allegations in paragraph 2.
3. Plaintiff admits the allegations in paragraph 3.
4. Plaintiff admits the allegations in paragraph 4.
5. Plaintiff denies the allegations in paragraph 5.
6. Plaintiff denies the allegations in paragraph 6.
7. Plaintiff denies the allegations in paragraph 7.
8. Plaintiff denies the allegations in paragraph 8.
9. Plaintiff denies the allegations in paragraph 9.
  - A. Plaintiff denies the allegations in paragraph 9 (A).
  - B. Plaintiff denies the allegations in paragraph 9 (B).

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C. Plaintiff denies the allegations in paragraph 9 (C).

D. Plaintiff denies the allegations in paragraph 9 (D).

E. Plaintiff denies the allegations in paragraph 9 (E).

F. Plaintiff denies the allegations in paragraph 9 (F).

10. Plaintiff denies the allegations in paragraph 10.

B. Affirmative Defense

11. Defendants' counterclaim fails to state a claim upon which relief may be granted.

C. Prayer

12. For these reasons, Plaintiffs ask the Court to dismiss defendants' counterclaim with prejudice, to award Plaintiffs their attorneys fees and all other costs, and for such other and further relief as the Court deems just and proper.

Dated: June 28, 2001

Respectfully Submitted,



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**CERTIFICATE OF SERVICE**

I certify that on June 28, 2001, a copy of this instrument was served by certified mail, return receipt requested, on the following counsel of record:

James McCown  
Collin L. Hayes  
Jackson & Walker, L.L.P.  
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Ann Horat Petalas